

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

MARIA MICHAILIDOU,	)	
Plaintiff,	)	
v.	)	
	)	
EASTERN MAINE MEDICAL CENTER	)	
d/b/a NORTHERN LIGHT EASTERN	)	CIVIL ACTION
MAINE MEDICAL CENTER,	)	Docket No.:
	)	
and	)	
	)	
BRAD E. WADDELL,	)	
Defendants	)	

**NOTICE OF REMOVAL**

Defendants Eastern Maine Medical Center d/b/a Northern Light Eastern Maine Medical Center (“NLEMMC”) and Brad E. Waddell (“Dr. Waddell”), by counsel and pursuant to 28 U.S.C. § 1441, *et seq.*, request removal of a civil action commenced in the Penobscot County Superior Court, titled *Maria Michailidou v. Eastern Maine Medical Center d/b/a Northern Light Eastern Maine Medical Center and Brad E. Waddell*, Docket No. PENSC-CIV-2023-00110. In support of removal, Defendants respectfully state:

1. Plaintiff Maria Michailidou commenced this action by filing a Complaint in Penobscot Superior Court, Penobscot County, on or about September 19, 2023, a copy of which is attached as Exhibit A to the Declaration of Katharine I. Rand (“Rand Declaration”).
2. On August 31, 2023, Defendants accepted service of the Complaint.
3. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely as it has been filed with this Court within thirty (30) days after receipt by Defendants through service of Plaintiff’s Complaint.

4. The United States District Court for the District of Maine is the federal judicial district encompassing the Superior Court of Penobscot County, Maine, where this suit was originally filed. Venue, therefore, is proper in this district under 28 U.S.C. § 1441(a).

6. The Complaint asserts federal statutory claims. Thus, this Court has original jurisdiction pursuant to 28 U.S.C. § 1331 and this action may be removed to this Court pursuant to 28 U.S.C. § 1441(c) and 1446(a).

7. Each of the Defendants desires to remove the action to this Court.

8. Pursuant to 28 U.S.C. § 1446(a), copies of the Complaint, Summons, and other papers served on Defendants are attached, being all the process, pleadings, and orders served upon Defendants.

9. Pursuant to 28 U.S.C. § 1446(d), Defendants this day are filing a copy of the Notice of Removal with the Penobscot County Superior Court and sending copies of the notice to Plaintiff's counsel.

WHEREFORE, Defendants Eastern Maine Medical Center d/b/a Northern Light Eastern Maine Medical Center and Dr. Waddell respectfully request that the above-captioned action be removed from the Penobscot County Superior Court to this Court.

Dated: September 19, 2023

/s/ Katharine I Rand

Katharine I. Rand

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*Counsel for Defendants Northern Light Eastern  
Maine Medical Center and Brad E. Waddell, M.D.*

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2023, I served a copy of Defendants' Notice of Removal by electronic mail to the following counsel of record:

Adam R Lee, Esq.  
Trafton, Matzen, Belleu & Frenette, LLP  
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Dated: September 19, 2023

/s/ Katharine I Rand  
Katharine I. Rand

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*Counsel for Defendants Northern Light Eastern  
Maine Medical Center and Brad E. Waddell, M.D.*